

## **REMARKS**

Claims 2-9 and 11-18 are pending in the application. Claims 2-9 and claims 11-18 stand rejected. Reconsideration of the application is respectfully requested. The Examiner's rejections are addressed in substantially the same order as in the referenced office action.

Claims 2-9 and 11-18 stand rejected as being anticipated by U.S. Patent 5,350,189 to Tsuchitani et el. (the '189 reference). Applicant respectfully traverses, because the examiner has not presented a prima facie case of anticipation.

Each claim in the present application includes the limitation of **one or more reentrant grooves**, and the limitation is clearly defined in the application as a groove in an element that is larger toward the element center than at the element surface. The specification goes on to provide the benefit of such a groove in that the narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow. The disclosure states beginning at page 44 line 1, "As illustrated in FIGS. 14 and 15, the re-entrant grooves 1405, 1410, 1415, and 1420 have a narrower cross-section at the electrode surfaces and a wider cross section below the electrode surfaces. **The narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow."** The art of record does not teach such re-entrant grooves and the disclosed structures in the art do not provide the above-stated advantages.

The grooves **7** in the '189 reference have the opposite cross section structure. The grooves **7** are clearly narrower toward the center of the structure **4** than at the structure surface. Therefore, the '189 reference does not teach or suggest a re-entrant groove as claimed, and does not teach a structure providing the advantages of the claimed re-entrant

grooved structure. Consequently, the reference fails to teach each and every limitation of the rejected claim(s) as required for anticipation.

## CONCLUSION

, . . . G

For all the foregoing reasons, Applicant respectfully submits that all remaining claims are in a condition for allowance and requests timely issuance of a notice of allowance. No fee is believed due for this response. The Commissioner is authorized to charge any additional fee due or refund any overpayment to Deposit Account No. 13-0010 (IO-1002-US).

Respectfully submitted,

Date: January 27, 2004

Todd A. Bynum

Registration No. 39,488

MADAN, MOSSMAN, & SRIRAM, P.C.

2603 Augusta, Suite 700

Houston, Texas 77057-5640

Telephone: 713/266-1130

Facsimile:

713/266-8510